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Attorneys for Defendant

UNION PACIFIC RAILROAD COMPANY

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

STEFAN HYATT,

Plaintiff,

v.

UNION PACIFIC RAILROAD COMPANY,

Defendants.

Case No.: 2:25-cv-00315-DJC-JDP

**JOINT STIPULATION AND ORDER TO
EXTEND TIME FOR THE PARTIES TO
CONFER AND SUBMIT JOINT STATUS
REPORT**

Complaint Filed: January 24, 2025

Trial: Not set

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Stefan Hyatt and Defendant Union Pacific Railroad Company (together the “Parties”), by and through their respective undersigned counsel of record, as follows:

WHEREAS the Parties previously stipulated to two extensions of time for Defendant to respond to Plaintiff’s Complaint, and the second extension was approved by the Court and further extended Defendant’s time for response by 21 days to April 14, 2025 (*see* ECF nos. 6-8);

WHEREAS the Court previously issued an Initial Case Management Order on January 24, 2025 (“Order”) setting a deadline of 60 days from service of the Complaint for the Parties to confer and file a joint status report pursuant to Fed. R. Civ. P. 26(f), and based on the date Plaintiff served the Complaint that deadline is April 4, 2025;

WHEREAS in their second stipulation for a 21-day extension of Defendant’s time for response, the Parties inadvertently did not seek a corresponding extension of their deadline to confer and file a joint status report, and so are filing this stipulation to mutually request it herein;

NOW THEREFORE, the Parties hereby stipulate and mutually request that the time for the Parties to confer as required by Fed. R. Civ. P. 26(f) and prepare and submit the joint status report described in the Order be extended 21 days, to April 25, 2025.

Dated: April 4, 2025

CONSTANGY, BROOKS, SMITH & PROPHETE LLP

By: /s/ Michael N. Westheimer

Michael N. Westheimer

Attorneys for Defendant

UNION PACIFIC RAILROAD COMPANY

Dated: April 4, 2025

HILDERBRAND MCLEOD & NELSON LLP

By: /s/ Gavin Barney (as authorized on 4/4/2025)

Anthony S. Petru

Gavin Barney

Attorneys for Plaintiff

STEFAN HYATT

IT IS SO ORDERED.

Dated: April 4, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA

UNITED STATES DISTRICT JUDGE